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# *State Ethics Commission*

ANNUAL REPORT 1998





EXECUTIVE DEPARTMENT  
STATE OF MARYLAND



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# MARYLAND STATE ETHICS COMMISSION

## TWENTIETH ANNUAL REPORT

January 1, 1998 - December 31, 1998



# STATE ETHICS COMMISSION

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## Twentieth Annual Report and Twenty Year Summary

### **GENERAL STATUTORY IMPLEMENTATION**

The State Ethics Commission met 9 times during Calendar Year 1998 and was involved in program activity relating to all areas of its statutory mandate. The Commission has met 214 times since the Ethics Law went into effect in 1979. Commission activities in the calendar year covered financial disclosure, conflict of interest, lobbyist disclosure and conduct restrictions, local government ethics laws, school board ethics regulations, advisory opinions, enforcement matters, employee education, and public information activities. The Commission Chairman and Executive Director also served on the Governor's Commission on Healthcare Procurement. A full listing of members of the State Ethics Commission and statutory staff from 1979 to the present is included in Appendix D of this report.

#### *Issuance of Advisory Opinions*

The Commission issues advisory opinions in response to requests from officials, employees, lobbyists, and others who are subject to the Ethics Law. Additionally, the Commission may issue advisory opinions to other persons at its discretion. During Calendar Year 1998, the Commission issued 10 formal published opinions. Over the last 20 years, the Commission has issued 461 formal opinions. Many of the formal opinions considered in 1998 primarily dealt with the employment prohibitions of the Ethics Law. Other issues considered included procurement, ownership interests, participation, gifts, lobbying and political activity. One factor reducing the need for formal opinions issued by the Commission is the large number of existing opinions that can now be used for fast informal guidance. The Commission staff was able to provide informal guidance in 1270 potential formal request situations based on existing opinions of the Commission. The Commission itself provided informal advice in lieu of formal opinion guidance, usually in the form of a letter, in 123 situations during the year. Informal guidance covered nearly all aspects of the Ethics Law. Many advice inquiries were in part caused by State employee salary support limitations in State government which have resulted in a substantial number of secondary employment questions. The combined total number of advice situations (formal, Commission informal, and staff informal) increased by 25 during 1998. This is the sixth consecutive year of an increase in the combined totals of advice activity. The total for 1998 was 1,393 compared to 411 in 1986. The Commission began keeping statistics on this combined activity in 1986. Since that time, the combined types of advice has totaled 10,793.

### Financial Disclosure

The administration of the financial disclosure program continued to involve the identification of those required to file, providing technical assistance to filers, and monitoring compliance with the Law. The Commission was involved in reviewing a large number of requests by various agencies to add or delete positions from the financial disclosure filing list. Action on these requests, which is part of the agenda at nearly all Commission meetings, has increased the list of filers. The Commission also reviewed the Ethics Law status of new boards and commissions and considered and acted upon requests by advisory boards to be exempted from the requirement to file financial disclosure statements. Compliance review of forms is conducted as part of a phased program for review of the forms of officials and employees. Currently there are over 8,000 persons filing financial disclosure forms and this number continues to grow. Boards and Commissions are currently required to file a limited form of financial disclosure. In addition, copies of all judicial official financial disclosure forms are also filed at the Commission office. As part of the review program, letters are sent to some filers regarding the need to provide further information in order to meet filing requirements. Conflict of interest monitoring is also part of this process. In 1998, priority was given to review of candidates for State office financial disclosure forms to improve the completeness and accuracy of those reports.

In addition to the regular financial disclosure program, a very substantial number of appointees to executive boards or commissions seeking limited conflict of interest exemptions from the appointing authority, must file a form publicly disclosing areas of existing conflicts with the Commission, the appointing authority and the Senate where applicable. The Commission staff coordinated the filing of these forms with the appointing authority, reviewed the forms and assisted a large number of appointees throughout the year to complete these disclosures.

### Lobbyist Disclosure and Regulation

During the lobbying year which ended on October 31, 1998, 1,929 lobbying registrations were filed with the Commission. This represents an increase from the 1,715 registrations filed in 1997. The 1,929 registrations were filed by 571 different lobbyists on behalf of 905 separate employers. (Some employers have more than one lobbyist and many lobbyists have more than one employer.) This compares to 865 employers having one or more registrants in the previous year and 581 individual lobbyists in the prior year. The program has grown very substantially since 1979, the year when the program was taken over from the Secretary of State. The totals for registrations and employers is the highest in the history of the program. However, the number of lobbyists decreased in 1998. The growth in the number of lobbyists has been far slower than the growth in registrations, employers and expenditures. For example, in 1988 there were 415 registered lobbyists, 545 employers and 744 registrations spending \$9,405,759. This reflects a trend of a growing lobbying business being concentrated within a smaller group of lobbyist and firms. Although the largest number of lobbyists are registered during the legislative session, registrations are beginning and ending throughout the lobbying year, which begins on November 1 and ends on October 31 of the following year. Most persons registered to lobby have a single registration representing one employer, however, 104 lobbyists had two or more registrations during this time period, 66 registrants had four or more employers, and 42 lobbyists had eight or more employers. The Ethics Commission monitors lobbyist registration and reporting and other parts of the lobbying law covering gifts, contingent fees, and campaign finance activity.

The \$22,870,588 in lobbying expenditures reported for the period of October 31, 1998, represents an increase of \$2,523,143 over the previous year. This is the largest dollar amount reported in program history. Lobbying expenditures have very significantly increased since the Commission compiled \$2,864,454 of expenditures in 1979, the first year the Ethics Commission administered the filing program. Expenditures for gifts and entertainment in 1998 increased from \$635,543 to \$657,192. The total for gifts and entertainment was substantially below the record level of \$824,685 reported in 1993 but is far above the \$213,385 reported in 1980. The amount for food and beverages other than special events decreased slightly from \$58,880 to \$57,358. The amount in this category was dramatically lower than the \$416,924 reported in this category for 1992. This decrease appears to reflect mostly stronger disclosure laws in recent years and an increasing reluctance of officials to accept this type of entertainment. The amount spent for special events also decreased from \$546,441 in 1997 to \$504,818 in 1998. This is substantially above the \$245,288 reported for these types of events in 1994. Under current law, special events include events to which all members of the General Assembly, either house or a standing committee, is invited. Legislation passed in 1997 allows this exception to individual gift reporting to be expanded by the presiding officers of the General Assembly to certain geographic delegates. The presiding officers made no designations in 1997, thus the stricter disclosure requirement as to those events still applied. However, in August of 1998, designations were made of groupings as small as 2 members and as large as 40. The expansion of no recipient disclosure to committees and the very small size of some of these groupings is likely to increase the volume of this type of entertainment. Because the new delegations were not designated until very late in the lobbying year, there was little impact in 1998. There were 55 all-members events reported in 1998 totaling \$428,483. Not all of these funds were spent on General Assembly members because the cost for attendance of event sponsors, lobbyists, and others is sometimes reported in the event total cost. There were 44 events reported for House of Delegates Standing Committees and 45 for Senate Standing Committees. The total of 89 events was higher than the 74 events in 1997 but was significantly below the 116 reported in 1996. The most entertained committees in the House of Delegates were the Environmental Matters Committee with 14 events and the Economic Matters Committee with 13 events. The least entertained Standing Committees in the House were the House Judiciary Committee, House Appropriations Committee and the Commerce and Government Matters Committee each with 4 events. In the Senate, the least entertained committee was the Budget and Taxation Committee with 8 events. The most events reported in the Senate were for the Finance Committee with 17 events. The most entertained regional delegation was the Montgomery County Delegation.

Qualifying special events have become the favored form of entertainment by regulated lobbyists because these activities do not require the disclosure of individual recipients. In a few instances, events are labeled all-members events even where the location and other aspects of the event might suggest that it is not really intended for all members but to achieve the gift reporting exemption. The State Ethics Commission formally advised in Opinion 97-6 that an all-members event held hundreds of miles from Maryland could not be considered as an all-members event under the circumstances presented. A detailed analysis of special events spending is contained in Appendix C of this report. Lobbyists are also required to file gift reports naming individuals receiving meals, tickets or other gifts above certain thresholds. Sixty-four lobbyists filed 142 gift reports in 1998 compared to 113 in 1997. Gift reports may name one or more gift recipients. Gift reports tend to be concentrated among the higher spending employers. There were 46 special gift reports filed on behalf of the top 120 employers ranked by total lobbyist expenditures. The next 120 in that ranking only filed 15 special gift reports. Additionally, the \$80,129 reported for speaking expenses was a record high for this category.

An analysis of individual reports indicates that 118 lobbyist employers reported having total lobbying expenditures of \$50,000 or more. There were 243 lobbyist employers reporting total expenditures of \$25,000 or more. This compares to 241 employers reaching this total in 1997. Reports of individual lobbyists registered on behalf of one or more employers indicate that 67 reported \$50,000 or more in compensation for services. Thirty-four lobbyists reported compensation of \$100,000 or more. Two reported over \$1,000,000 in lobbying fees. The average compensation for the top 10 compensated lobbyists has risen from \$268,888 in 1988 to \$563,356 in 1998. Total lobbyist compensation also increased from \$16,729,154 in 1997 to \$17,262,525 in 1998. Examples of topic areas involving large total employer expenditures during the reporting period included business, professional football, gambling, labor, health, banking, tobacco, technology, attorneys, utilities, agriculture and insurance. Employer lobbying spending continues to increase significantly. In 1988, only 5 employers spent over \$100,000 on lobbying. In 1998, 32 employers exceeded \$100,000. A list of those employers expending \$25,000 or more and those lobbyists reporting \$50,000 or more in compensation is included in Appendices A and B of this report. There was a record amount spent on grass roots lobbying in 1998 totaling \$2,145,818. Most of these funds were spent by the racing industry and this eclipsed the previous high in the grass roots spending category of \$460,633 in 1997.

The following expenditure data summarizes lobbying expenditures for the last three lobbying years:

	<u>10/31/96</u>	<u>10/31/97</u>	<u>10/31/98</u>
1. Expenditures for meals and beverages for officials or employees or their immediate families.	\$ 73,172	\$ 58,880	\$ 57,358
2. Expenditures for special events, including parties, dinners, athletic events, entertainment, and other functions to which all members of the General Assembly, either house thereof, or any standing committee thereof were invited. (Date, location, group benefitted, and total expense for each event are also reported.)	\$ 569,371	\$ 546,441	\$ 504,819
3. Expenses for food, lodging, and scheduled entertainment of officials and employees and spouses for a meeting given in return for participation in a panel or speaking engagement at the meeting.	\$ 13,219	\$ 8,063	\$ 80,129
4. Expenditures for gifts to or for officials or employees or their immediate families (not including sums reported in 1, 2, and 3).	\$ 18,540	\$ 22,159	\$ 14,886
<b><u>Subtotal of items 1, 2, 3, &amp; 4</u></b>	<b><u>\$ 674,302</u></b>	<b><u>\$ 635,543</u></b>	<b><u>\$657,192</u></b>



5. Total compensation paid to registrant (not including sums reported in any other section).	\$16,005,012	\$16,729,154	\$17,237,276
6. Salaries, compensation and reimbursed expenses for staff of the registrant.	\$ 606,419	\$ 752,181	\$ 783,605
7. Office expenses not reported in items 5 and 6.	\$ 897,054	\$ 915,309	\$ 830,386
8. Cost of professional and technical research and assistance not reported in items 5 and 6.	\$ 293,056	\$ 461,190	\$ 729,941
9. Cost of publications which expressly encourage persons to communicate with officials or employees.	\$ 197,467	\$ 460,633	\$2,160,301
10. Fees and expenses paid to witnesses.	\$ 40,488	\$ 738	\$ 29,540
11. Other expenses.	\$ 403,098	\$ 392,697	\$ 442,347
<b><u>Total of items 1 through 11</u></b>	<b><u>\$19,116,896</u></b>	<b><u>\$20,347,445</u></b>	<b><u>\$22,870,588</u></b>

NOTE: At the time the Annual Report was compiled, some lobbyist expenditure information was subject to adjustment based on the staff review program.

#### Enforcement Activities

The Ethics Law and implementing rules of the Commission provide that any person may file a complaint with the Commission. Complaints filed with the Commission must be signed, under oath, and allege a violation of the Law by a person subject to the Law. Additionally, the Commission may file a complaint on its own initiative, and it carries out preliminary inquiries of potential law violations at its discretion. Because of the limited investigative resources available to the Commission, there is some backlog of enforcement issues pending with the Commission.

In Calendar Year 1998, the Commission issued or accepted 94 complaints. Eighty-three complaints involved financial disclosure matters, 6 complaints involved lobbyist matters, 4 complaints related to conflict of interest issues, and 1 complaint related to the procurement restrictions in Section 15-508 of the Law. During this calendar year action was completed on 48 complaints. Thirty-eight of the completed complaint matters were financial disclosure matters. Twenty-five failure to timely file financial disclosure statement complaints were terminated by accepted the late filing as a cure. Ten late financial disclosure complaints were resolved by submission of the form and acceptance of a stipulation of settlement which included an admission of late filing violation, waiver of confidentiality, acceptance of a reprimand, and the payment of funds (in lieu of late fees and fines) to the State. A total of \$4,650 was paid to the State pursuant to these agreements during 1998.

Two hearings were held during the year involving respondents who had failed to timely file the required financial disclosure statement. At one hearing the Respondent appeared. The hearings resulted in a finding of failure to timely file; assessed late fees in accord with Section 15-405(d)(2) of the Ethics Law; and a reprimand. The matter in which the Respondent appeared resulted in the payment of \$500 in late fees. The other matter involved a former employee and has been referred to the appropriate agency for enforcement of the order to pay late fees.

Four of the complaints completed during the year involved lobbyist matters. One matter involved a situation where the lobbyist failed to report a substantial amount of expenditures by his employer which were related to a grass roots campaign effort. The complaint was resolved by the respondent accepting a public Commission reprimand which was distributed to the Speaker of the House and the President of the Senate. The respondent lobbyist also paid \$500 in lieu of late fees and civil fines. Two other lobbyist matters involved former officials who had after leaving office became lobbyists and also continued their campaign committees which resulted in the former official being involved in campaign contribution activities inconsistent with the requirements of Section 15-707 of the Ethics Law. These two complaints were resolved by the lobbyist-respondent seeking return of the contributions; admitting a violation of the law; accepting a Commission reprimand, and paying the sum of \$1,000 in lieu of potential civil fines. Although these matters were resolved at the end of calendar year 1998, the payments were not made until January, 1999.

One hearing was held during the year involving a lobbyist-respondent who had failed to timely register on behalf of his employer. The hearing resulted in a finding of failure to timely register and the assessment of late fees pursuant to Section 15-405(d)(1) in the amount of \$250.

The Commission also considered several other situations involving lobbyists who had failed to timely file either a registration or lobbying activity report. These matters resulted in lobbyists paying late fees in amounts up to \$250 per report as allowed by the Ethics Law. The Commission received a total of \$2,500 payments to the State of Maryland from 10 different lobbyists. All enforcement payments are deposited in the State's general fund and cannot be used by the Commission.

Four conflict of interest complaints were resolved during Calendar Year 1998. One complaint involved the head of an agency who had acquired a financial interest in an entity which was contracting with his agency. The employee had disclosed the interest on his financial disclosure statement. The complaint was resolved by a public cure agreement where the respondent: admitted his actions were inconsistent with the law; accepted a reprimand which was transmitted to the appointing authority; disposed of the interest; and paid to the State a sum equal to his stock price gains from the transaction. A second complaint involved an employee whose dependent child had summer employment with a contractor of his agency. The employee had duties related to the contract. The complaint was resolved with a public cure agreement where the respondent: admitted that his participation in contract matter while his son was employed with the contractor violated the law; accepted a reprimand which was transmitted to the appointing authority; and paid to the State a sum equal to the compensation paid to his dependent child during the summer.

A third conflict of interest complaint was resolved when the former employee admitted that he had participated in matters as a State employee involving his future employer at a time when he was negotiating employment with it in violation of Section 15-501 of the Law. The former employee also paid the State the sum of \$2,500 in lieu of potential civil fines. The fourth complaint also involved a former official who was alleged to have an improper

private business relationship with an employee he directly supervised and who had filed financial disclosure statements which were not complete over a period of time. The complaint also alleged that the former official received an excessive amount of meals and beverage paid for by a regulated lobbyist. This complaint was resolved by the former official admitting he violated the participation provisions of the Law as it related to his supervision of the employee with which he had the business relationship; that he had accepted gifts in violation of the Law; and that he had failed to properly complete his financial disclosure statements. The official also accepted a Commission reprimand and agreed to pay \$1,750 in late fees for his improper filings and \$2,000 in lieu of potential civil fines. These sums were paid to the State in January, 1999. The official also reimbursed the regulated lobbyist for meals received.

The final complaint resolved in 1998 involved an entity which was alleged to have violated the participation in procurement restrictions provisions (Section 15-508) of the law. This complaint was resolved by the State agency involved withdrawing the procurement; the entity admitting that its submission of a proposal to the agency at a time when it had offered employment to an employee of that agency who had assisted in the drafting of the specifications violated the Law; and the entity paying the State the sum of \$5,000 in lieu of civil fines. This sum was subsequently paid to the State in January, 1999.

At the end of Calendar Year 1998, 7 complaints were pending involving conflict of interest. Additionally, there were 86 complaints involving financial disclosure and lobbyist filings pending. The total enforcement payments and late fees received by the Commission in 1998 was \$14,968.30. (Additionally the year closed with orders or agreements to pay another \$10,750 which was paid in January, 1999.) Finally, there remains a conflict of interest complaint from 1997 which had been appealed by the respondent to the Circuit Court. The matter remains pending at this time. The Commission's order in that case included payment of \$1,000 in late fees and civil fines in the amount of \$7,500. The Commission is represented in this matter by the Office of the Attorney General.

A review of the Commission records indicate that since its beginning in 1979, the Commission had 256 matters resolved with public orders or public agreements. One hundred and twenty-one of these matters involved formal complaints against State employees or officials who had failed to timely file one or more financial disclosure statements. A total of 100 different employees and officials were involved. The processing of these complaints changed somewhat after July 1, 1990 when the Commission was given authority to assess late fees up to \$250 per statement. (Prior to that time the Commission could accept settlements in these matters which provided for a payment by the respondent in lieu of the Commission seeking civil fines in Circuit Court.) These financial disclosure enforcement matters have resulted in the collection of a total of \$24,288.00 in late fees and payments in lieu of civil fines. Four of these matters which resulted in Commission ordered late fees in the total amount of \$1,694 have been referred to the State's Central Collection Unit for collection. One final matter is pending in Circuit Court to enforce the Commission's order to file the financial disclosure statement and pay \$500 in late fees. The Commission is seeking civil fines in that matter.

A total of 101 of the 256 matters since 1979 involved lobbyist issues. Ninety-three of these matters involved lobbyists who had failed to either timely register with the Commission or timely file an activity report. These matters for the most part were resolved by late filing agreements and after the Commission was given authority to assess late fees in 1988. A total of \$25,600 has been paid by lobbyists as late fees or in lieu of civil fines. Four of these matters involved lobbyists who had filed an activity report which failed to disclose all lobbying expenditures. These individuals were required to file amended reports and paid a

total of \$3,750 in late fees and payments in lieu of fines. The remaining 4 matters involved lobbyists who had violated the campaign contribution solicitation and transmittal restrictions of the law. These individuals paid a total \$3,250 in lieu of civil fines as part of their settlement agreements with the Commission. Two lobbyist matters, which had hearings, were referred to the Central Collection Unit for collection of the late fees. This Unit collected \$258.38 in late fees and collection costs. The other matter involving the collection of \$1,500 remains open.

Of the 256 matters resolved by public order or agreement since 1979, a total of 34 involved conflict of interest matters. Some of these matters also had failure to complete financial disclosure statements accurately as part of the complaint. Thirty-one of these matters resulted in payments to the State in the total amount of \$59,942. These payments represented a combination of payments of late fees for late or incomplete financial disclosure statements, payment in lieu of civil fines, and payments representing return of specific benefits by the improper conduct. One complaint matter was resolved by the respondent's resignation from State service, forfeiture of his leave in an amount in excess of \$4,600, and his agreement to pay \$5,000 in lieu of civil fines. The matter was referred to the Central Collection Unit which has collected a total of \$2,487 from the respondent. Another complaint, after a Commission hearing where 5 violations of the law were determined was appealed to the Circuit Court by the respondent. The Court subsequently ordered fines of \$2,500. One conflict of interest matter remains on appeal to the Circuit Court. The Commission is seeking the payment of \$1,000 in late fees, \$7,500 in civil fines, and a fifteen day suspension without pay. All funds paid for late fees or violations of the Ethics Law are paid to the General Fund of the State and cannot be used by the State Ethics Commission for its case related expenses.

Early in its history, the Commission accepted 3 cure agreements which were not public but resolved complaints and included a payment in lieu of a civil fine. In one instance the respondent paid \$500 to the State, in the other instance the respondent paid the employing agency the sum of \$2,790. The third provided for a donation in the amount of \$3,200 to a national charity.

#### Local Government Ethics Laws

Maryland counties and cities are required under the Ethics Law to enact local laws similar to the State Law. In addition to the requirement that counties and cities enact ethics laws, in 1983, the General Assembly amended the Law to require local school boards either to promulgate ethics regulations similar to the State Law or be covered by county ethics laws. Most of the staff activity relating to local ethics programs during 1998 involved providing limited technical assistance to local ethics officials regarding ongoing administration of local government ethics programs. As part of its responsibilities, the Commission reviewed new or revised ethics laws for 9 localities during 1998. Some amended local laws were still under review and not approved at the end of the year. Criteria for evaluating similarity to the State Law are defined in Commission regulations. Municipalities, based on size and other factors, may be exempted from all or part of the requirement, though an exemption may be granted only in response to a written request. The Commission has held several Statewide local government ethics seminars since 1979. It is likely that the next seminar will be planned in 1999.

An annual listing of local governments having ethics laws is to be published in the *Maryland Register* and included with the Commission regulations in COMAR 19A.04 and 19A.05.

### Educational and Informational Activities

The Commission staff has been active in providing information to those covered by the Ethics Law, as well as other persons interested in its requirements. A substantial daily staff workload has involved advising employees, officials, candidates and lobbyists on how to complete forms, and providing informal advice regarding possible conflicts of interest. The Commission staff has assisted local government and school board officials in drafting their ethics laws and regulations. The staff has also provided technical advice to local government ethics boards. Presentations were made by the staff to various groups covered by the Law or interested in the operation of the Law. Numerous formal briefings and training programs were made to groups of employees, officials, or lobbyists on the requirements of the Law. Employees of several agencies or departments received special briefings. The annual lobbyist briefing was provided in Annapolis. Presentations were also made to other groups interested in the operation of the lobbying law.

Part of the Commission's public information activity involves distribution of lists of registered lobbyists and provision of assistance to persons inspecting various forms filed with the Commission. Pamphlets describing the Ethics Law have been made available to management level employees in State agencies. Another pamphlet covering ethics requirements for part-time members of State boards and commissions is also being distributed on a limited basis. Fiscal limitations have essentially reduced the ability to develop new printed materials. The Commission's staff does distribute, through interagency mail, a special two-page summary of ethics requirements to State agency managers. Special memos regarding the impact of the ethics law on gifts, procurement, post-employment, employment, and on political activity are also distributed. Also, memos on new lobbying laws relating to private colleges, lobbyist political activity, and a memo regarding adjustments to the procurement ethics provisions were distributed. A special memo to advise potential new members of boards and commissions of the impact of the Ethics Law was developed and distributed in 1998.

A home page on the Internet was maintained. The home page includes a program summary, a lobbyist list and related data, the Annual Report, and a bi-monthly bulletin. Also included are copies of lobbying and financial disclosure forms and the ability to access these forms. A new feature of this site, established in 1999, is the provision of a list of State vendors that can be queried by agency or vendor. The Internet provides a cost effective mechanism for providing ethics information and training to those covered by the Ethics Law and public access to ethics information. The staff is also very frequently involved in assisting the public and press in inspecting public records of lobbyists and officials and providing access to other ethics law information.

### **LEGISLATIVE RECOMMENDATIONS**

In 1998, the General Assembly did not pass any legislation that directly amended the State Ethics Law. A bill passed establishing a legislative ethics study commission. Another bill passed requiring the Department of Health & Mental Hygiene to further develop ethics and due process requirements for health occupational licensing boards. The initial work was completed in 1997 by the Executive Director of the State Ethics Commission.

The Commission continues to review the adequacy of the Public Ethics Law as required by the statute. The recommendation listed below was specifically suggested to the administration for departmental legislation in 1999.

### Public Officials Ethics Law Training

One of the legislative mandates for the State Ethics Commission is to provide officials and employees covered by the Ethics Law information about the Law and how to comply. The Commission engages in a variety of training and informational activities in order to provide Ethics Law information to officials and employees.

Although these activities are very helpful in providing the needed information and training, they are all very dependent on the level of interest and cooperation of individuals and agency managers. As a result, the level of training and information is very uneven throughout State government. The Commission proposes a limited but important proposal to focus on training for public officials. These non-elected persons who file financial disclosure statements are managers, policy advisors, and procurement personnel. Persons being determined to be public officials for the first time would receive not less than 2 hours of ethics training within 6 months of being designated a public official under the Ethics Law.

Public officials would be told of the training requirement when identified as having to file financial disclosure. The training would probably be offered monthly (or more often where required) using existing Ethics Commission staff and State owned facilities. Therefore, the cost would be very minimal as far as the direct expenditure dollars. The benefit would be better ethics performance in State management and contracting not only because the public officials would be trained but their knowledge would also be imparted to their own staff.

This mandated training program would supplement current efforts which would continue at least at current levels.

### OTHER LEGISLATIVE RECOMMENDATIONS

The recommendations listed below have also made by the State Ethics Commission. Many of these recommendations have appeared in prior annual reports but some are revised or new. The Commission believes that these recommendations are appropriate, based on its experience in administering the ethics program:

- The Law should be formally amended to more specifically reflect advice by the Commission and the Attorney General regarding testimonial fund raising by employees and officials, which is fully covered by the Ethics and Elections Law.

- The Election Law provisions dealing with contested elections do not clearly deal with these matters leaving potential questions about the solicitation, acceptance, and disclosure of these funds. Election Law should be amended to clearly establish limits and disclosure of this activity as part of the election function and not as gift activity.

- There is a need to consider granting the Commission at least minimal fining authority in conflict of interest matters in order to provide a formal alternative to expensive court proceedings.

- The current Law does not seem to always clearly deal with gifts from foreign governments. There is a need to review the issue and clarify the Law.

- The post-employment provisions of the Ethics Law should be reviewed and revised in order to avoid abuses that can occur under the technical language of the current law. This review should focus on higher level management positions.

- The Ethics Law prohibits certain types of representation before State agencies. However, except for legislative disclosure under §15-513 of the Ethics Law, there is no specific required disclosure of representation before State agencies. It is recommended that officials who appear before State agencies for compensation include on their annual disclosure form at a minimum the identity of any agencies involved in this compensated representation.

- The Ethics Law prohibits employees and non-elected officials from intentionally using their prestige of office for their own private gain or that of another. Elected officials, however, are not adequately covered by this provision. The existing Law should be amended to clearly include elected officials or a new provision covering these officials dealing with clear cases of abuse should be specifically added to the Law.

- The Commission has been presented with several situations where high State officials have been invited to serve on the board of directors of private corporations having sensitive business or regulatory involvement with the State. The existing Ethics Law provisions are not well designed to effectively control the conflicts that can be caused by such affiliations. It is recommended that membership by high officials on the boards of these types of corporations be controlled more specifically in the Ethics Law.

- Issues regarding the spouses of employees or officials have arisen in Maryland and on a national basis. The Maryland Public Ethics Law does not consistently and clearly address these issues or provide sufficient policy guidance in these matters. Spouse ethics issues have become more prevalent in part as a reflection of both spouses having careers and other economic relationships. For example, the Law does not always clearly deal with gift disclosure or under what circumstances the ownership interest of a spouse is to be attributed to the official or employee for conflict of interest purposes of the Ethics Law.

- The Commission receives many questions from agencies and others concerning issues involving State related foundations. Some of these questions relate clearly to the Ethics Law and can be resolved by the Commission. Many of these questions involve fiscal and general policy issues unrelated or only indirectly related to the Ethics Law. It is not possible for the Commission to determine appropriate policy in these areas. Any control mechanisms that need to be established to reach these concerns should be established by the Executive and Legislative branches of government as part of ongoing policy development.

- Consideration should be given to having new officials file a financial disclosure statement covering their holdings as of the time when they come into their position rather than for the previous calendar year.

- The Chief Election Law Administrator in each county should be required to file financial disclosure either by Executive Order or by statute.

- The law should be amended to expressly state that Deputy Sheriffs and other Sheriffs' Office employees other than the elected Sheriff are also covered by local ethics laws consistent with the Commission's advisory opinion on this topic. Issues have also been raised whether local authority is sufficient to cover assistant State's Attorneys and liquor licensing authorities in local ethics laws. Although local laws generally do cover these situations, there may be a need to make this local authority and requirement more clear.

- The need for disclosure of interests in mutual funds should be reviewed to determine if this information is fully necessary to accomplish the purposes of the Law.

- The provisions of §15-608 regarding attributable interests should be studied with the idea of reducing the burden caused by the disclosure requirements when a person has a small share in a large diverse testamentary trust.

- Judicial candidates should be required to file financial disclosure in each year of their candidacy in the same way as other candidates for State office.

- In election years improperly filed candidate's disclosure forms create unique enforcement problems. Before a violation can be found and made public a variety of confidential administrative and adjudicatory processes have to occur. In most cases this process would extend well beyond the primary election and probably beyond the general election. This means that serious completion problems or even false disclosure could exist unknown to the voting public. A very large percentage of non-incumbent candidates have substantial financial disclosure statement completion problems. A review should be made by the Executive and the General Assembly to determine whether confidentiality should be eliminated for candidate's financial disclosure enforcement cases at an earlier point in the enforcement process.

- Some consideration should be given to removing the current language dealing with Commission review of forms in §15-205(a)(5), and substituting a provision for review consistent with standards to be established by the Commission.

- In order to avoid uncertain and confusing application and administration of the Law, the special provisions of §15-807 making members of State boards funded in whole or in part by Baltimore County subject to the county disclosure law instead of the State Law should be considered for elimination, or at a minimum copies of these forms should be filed with the State Ethics Commission.

- The bi-county agency ethics regulations requirements as to employees of these agencies should be reviewed to make sure that sufficient penalty provisions are provided and that the current ethics regulations of the agencies meet the intent of the Law.

- The Commission has informally determined that the bi-county agencies are to be treated as State or local agencies for the purposes of exemptions under the State lobbying registration requirements. The Law should be amended to specifically clarify their status under these provisions.

- Consideration should be given to specifically prohibiting the solicitation of loans or assistance in getting loans by employees and officials from lobbyists and certain regulatees.

- The lobbyist restrictions regarding campaign finance activity should be made more specific as to the impact of these provisions on political party central committee membership by lobbyists.

- Consideration should be given to further limiting the role of lobbyists in political fundraising, particularly in the area of sending fundraising tickets to lobbyists and these tickets being forwarded to their employers.

- The statute of limitations in criminal violations of the State lobbying law is too short and should be extended.

- Consideration should be given to a one-legislative session, no lobbying cooling-off period for former legislative and other employees having significant duties relating to legislation.



- There is a need to include provisions to require lobbying registration and reporting for not-in-the-physical-presence lobbying particularly where significant compensation is involved. This problem will become more significant as new methods of electronic communications are further developed.

- The lobbyist disclosure of gift process could be clarified and strengthened. The rules on immediate public availability of gift reports are inconsistent and the size of some designated regional delegations is too small to avoid reporting avoidance techniques by lobbyists.

- The law should provide that counties or cities may use lobbying registration and reporting with the State Ethics Commission as an alternative or substitute for local filing.

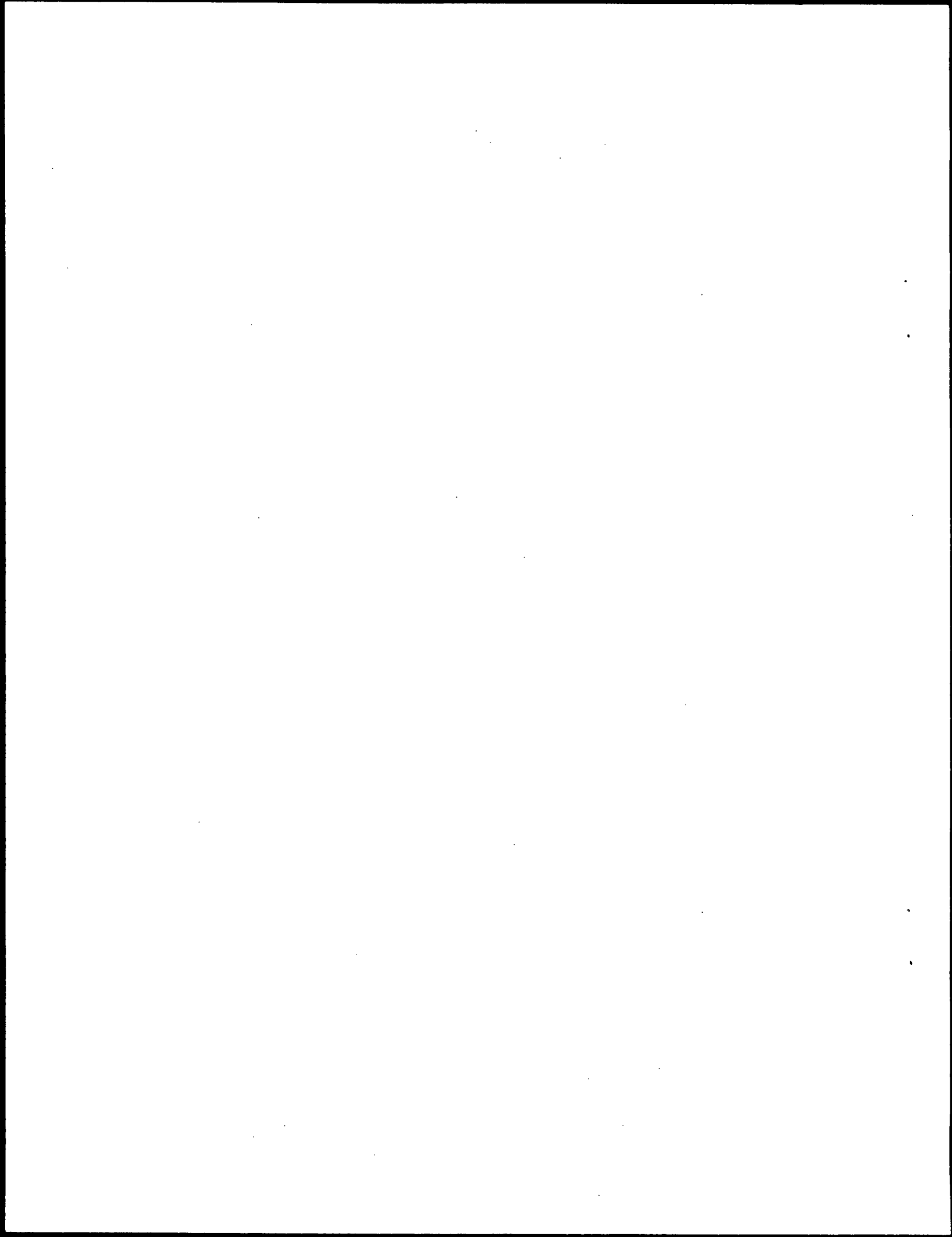
- The provisions for confidentiality in the Ethics Law should be reviewed to determine if they adequately protect privacy without denying needed information to operations agencies or the public.

- The provisions covering school board ethics regulations need to be strengthened to assure that there are adequate sanctions for violations by board members, candidates for board membership and lobbyists.

- There has been an increase in issues regarding potential conflicts of interests involving persons appointed to State boards and commissions. In part, it has been caused by minor short term advisory boards being more frequently created by statute in recent years instead of being created by Executive Order not having the force of law or legislative resolution. Boards created by law are covered by the Ethics Law. A related problem is many new boards are being created with appointments criteria mandating a significant conflict of interest. It is recommended that where minor short-term advisory boards are created, they not be established by law and where statutory boards are created more care be exercised in avoiding mandatory major conflicts of interests in appointment requirements. Generally, lobbyists should not be appointed to boards that have duties relating to their lobbying activities. These types of appointments make violations of the law while on the board or post service almost unavoidable.

- In 1996, the General Assembly passed legislation requesting the Executive Director of the State Ethics Commission to make a study of the standards of conduct for health occupational licensing boards. In 1997, these recommendations were made to the relevant legislative committees and the Department of Health and Mental Hygiene was assigned to prepare a detailed action plan and procedures in 1998. The General Assembly should continue to monitor these activities.

- The law prohibiting misuse of confidential information should be extended to cover former officials and employees as to confidential information acquired during their State service.



# APPENDIX A

## EMPLOYER SPENDING \$25,000 OR MORE - ALL REGISTRANTS ALL TYPES OF EXPENSES

*November 1, 1997 - October 31, 1998*

<u>TOTAL AMOUNT</u>	<u>EMPLOYER</u>
1. \$1,240,539.50	Maryland Jockey Club/Pimlico Race Track
2. 1,240,539.41	Laurel Racing Association, Inc.
3. 429,204.00	Maryland Chamber of Commerce
4. 328,148.32	Maryland Assn. of Health Maintenance Organizations, Inc.
5. 239,004.00	MEDCHI, The Maryland State Medical Society
6. 233,900.20	A T & T
7. 232,946.52	Cable TV Association of MD, DE, & DC
8. 219,413.64	Marylanders for Sensible Electricity Reform
9. 212,393.49	Maryland State Teachers Association
10. 195,739.99	Maryland Retail Merchants Association
11. 190,141.37	Bell Atlantic-Maryland, Inc.
12. 189,230.64	Potomac Electric Power Company
13. 183,850.90	Delmarva Poultry Industry
14. 165,304.02	Maryland Hospital Association
15. 155,106.21	Maryland Association of Realtors, Inc.
16. 151,843.86	Hobelmann Port Services, Inc.
17. 148,937.34	Maryland State Bar Association
18. 145,749.25	Maryland Bankers Association, Inc.
19. 137,589.00	St. Agnes Hospital
20. 134,376.20	Horseshoe Gaming, Inc.
21. 128,316.00	Maryland Industrial Group
22. 123,648.82	Law Offices of Peter Angelos
23. 122,249.17	Lockheed IMS Corporation
24. 121,444.25	Helix Health, Inc.
25. 120,863.60	Pro Football, Inc. (The Redskins)
26. 117,253.19	Rite Aid Corporation
27. 108,808.83	Johns Hopkins Medicine
28. 108,081.10	Automated Wagering, Inc.
29. 105,605.78	American Water Works Co. Inc.
30. 104,956.27	Enron Energy Sevices, Inc.
31. 101,981.09	Blue Cross & Blue Shield of Maryland

32.	101,860.89	Association of Maryland Pilots
33.	97,227.79	Maryland State Licensed Beverage Assn.
34.	96,807.47	Holy Cross Hospital of Silver Spring, Inc.
35.	95,820.00	Marylander's for Efficient and Safe Highways
36.	94,833.78	Philip Morris Management Corporation
37.	93,138.59	American Cancer Society, MD Division
38.	90,966.41	NYL Healthcare Plans of Mid-Atlantic
39.	90,670.39	Cloverleaf Enterprises
40.	90,000.00	Buck Distributing Company
41.	88,718.32	Wheelabrator Water Technologies, Inc./BioGro
42.	87,574.23	Common Cause/Maryland
43.	86,325.90	Allegheny Power
44.	85,860.57	Maryland Optometric Association
45.	85,728.70	Casino America, Inc.
46.	84,108.09	Atlantic Richfield Company
47.	83,176.00	Baltimore Gas & Electric Company
48.	82,000.00	Maryland Trial Lawyers Association
49.	81,467.98	Health Facilities Association of Maryland
50.	81,425.41	Maryland Association of Chain Drug Stores
51.	81,173.59	League of Life and Health Insurers of Maryland
52.	80,588.56	Chemical Industry Council of Maryland
53.	78,651.86	Mid-Atlantic Medical Services (MAMSI)
54.	77,445.00	Greater Washington Board of Trade
55.	77,131.09	Adventist Health Care Mid-Atlantic, Inc.
56.	76,295.03	Maryland Classified Employees Association
57.	76,195.04	Merck & Company, Inc.
58.	75,851.89	American Petroleum Institute
59.	75,793.50	University of Phoenix
60.	75,389.00	Washington Gas, Maryland Division
61.	74,795.64	Maryland Tort Reform Coalition
62.	72,609.72	Capital Asset Research Corporation
63.	72,501.65	Greater Baltimore Committee
64.	72,307.51	Norfolk Southern Corporation
65.	72,296.54	Medical Mutual Liability Insurance Company
66.	72,120.29	Tobacco Institute
67.	71,614.91	Glaxo Wellcome Inc.
68.	70,308.00	Johns Hopkins University
69.	70,223.94	R.J. Reynolds Tobacco Company

70.	69,744.00	Greenbelt Metropark, L.L.C.
71.	69,431.84	Nationwide Insurance Enterprises
72.	68,844.33	Apartment & Office Building Assn. of Metro Washington
73.	67,492.40	Restaurant Association of Maryland, Inc.
74.	67,359.58	Maryland Farm Bureau, Inc.
75.	67,059.50	Maryland State Dental Association
76.	65,808.54	Kraft Foods, Inc.
77.	65,763.58	Variable Annuity Life Insurance Co. (VALIC)
78.	65,673.17	General Motors Corporation
79.	65,463.31	Maryland State & D.C. AFL-CIO
80.	64,971.71	Maryland Highway Contractors Association
81.	63,235.15	MCI Telecommunications Corporation
82.	63,213.59	Suburban Hospital
83.	62,800.07	Baltimore Ravens, Inc.
84.	61,355.29	Nextel Communications
85.	60,900.25	Maryland Independent College and University Association
86.	60,357.69	SCI Atlantic Region
87.	60,303.40	Information Systems & Network Corporation
88.	60,000.00	Ameristar Casinos
89.	60,000.00	TFWS, Inc.
90.	59,071.60	Maryland Builders Association
91.	59,011.25	Crown Central Petroleum Corporation
92.	58,883.20	Kaiser Foundation Health Plan of Mid-Atlantic States, Inc.
93.	58,742.02	Maryland Association of Mortgage Brokers
94.	58,723.86	Doctor's Health System
95.	58,269.59	UST Public Affairs, Inc.
96.	57,844.00	Maryland Association of Non-Profit Homes for the Aging
97.	57,082.31	MARTA Technologies
98.	56,514.50	Associated Builders and Contractors of Metro Washington
99.	56,332.42	Montgomery County Chamber of Commerce
100.	56,268.09	Baltimore Jewish Council
101.	55,800.00	Alliance for Customer Choice of Electrical Suppliers
102.	54,798.65	State Farm Insurance Companies (IL)
103.	54,338.44	Manor Care Corporation and Vitalink
104.	54,000.00	Smoke Free Maryland: A Coalition for Tobacco Control
105.	53,931.60	Bally's Maryland, Inc.
106.	53,841.53	Giant Food, Inc.
107.	53,704.95	Washington Area New Automobile Dealers Assn. (WANADA)

108.	53,459.45	National Federation of Independent Businesses
109.	53,166.60	Maryland New Car and Truck Dealers Assn.
110.	53,162.37	CSX Transportation
111.	53,162.37	American Insurance Association
112.	53,115.72	Quest Diagnostics
113.	52,000.00	International Game Technology
114.	51,821.17	Fraternal Order of Police, Maryland State Lodge
115.	50,696.65	Old Dominion Electric Cooperative
116.	50,428.22	CIGNA Corporation
117.	50,287.55	Coca-Cola Enterprises - Northeast
118.	50,000.00	Fountainhead Title Group, The
119.	49,909.88	Group Hospitalization & Medical Services
120.	49,748.59	Trigen-Baltimore Energy Corporation
121.	49,638.00	Northrup Grumman Corporation
122.	49,406.75	Delmarva Power & Light Company
123.	49,231.75	Greenspring of Maryland
124.	48,741.00	Maryland Catholic Conference
125.	48,035.08	Maryland Association of Resources for Families & Youth
126.	47,879.90	Maryland Insurance Council
127.	47,351.47	Pharmaceutical Research & Manufacturers of America
128.	47,146.87	Schaller Anderson of Maryland, LLC
129.	46,950.00	Prince George's County Board of Education
130.	46,540.00	United Way of Central Maryland
131.	46,507.01	Sun Company, Inc.
132.	45,699.00	Mothers Against Drunk Driving
133.	45,397.39	Dimensions Healthcare System
134.	45,375.29	EPIC Pharmacies - Maryland
135.	45,234.00	National Association of Independent Insurers
136.	45,163.01	Prime Health Corporation
137.	45,000.00	St. Joseph Medical Center
138.	44,485.13	Bethlehem Steel Corporation
139.	44,482.70	Suburban Maryland Building Industry Association
140.	44,385.00	MedLantic Healthcare Group
141.	43,663.21	Professional Insurance Agents Association of PA, MD & DE
142.	43,433.00	Republic Industries, Inc.
143.	42,636.03	District of Columbia Hospital Association
144.	42,528.04	Maryland Manufacturing Association
145.	42,493.22	Health Insurance Association of America

146.	42,341.32	Sverdrup
147.	42,047.55	Planned Parenthood of Maryland
148.	42,000.00	Washington Metropolitan Transit Authority
149.	41,351.29	Johnson Controls, Inc.
150.	40,708.67	Association of Northern Chesapeake Docking Pilots
151.	40,339.27	HLR Services, Inc. (Hoffman-LaRoche, Inc.)
152.	40,222.21	Household Financial Group, Ltd.
153.	40,120.42	Advocates for Children & Youth, Inc.
154.	39,950.00	Association of Forest Industries
155.	39,653.88	Ogden Energy Group, Inc.
156.	39,579.69	Maryland Chiropractic Association
157.	39,435.68	MD/DC Society of Anesthesiologists
158.	39,000.00	USF & G
159.	39,000.00	Prince George's County Planning Board
160.	38,679.50	Chesapeake Bay Foundation
161.	38,600.00	Montgomery County Office of Intergovernment Relations
162.	38,584.29	Maryland State & DC Professional Firefighters Assn.
163.	37,698.50	Maryland State Funeral Directors Association
164.	37,158.00	Maryland Association of Non-Profit Organizations
165.	36,937.54	General Public Utilities Companies
166.	36,831.66	State Farm Mutual Automobile Insurance Company
167.	36,685.11	Copeland Associates, Inc.
168.	36,410.71	Maryland Association of Green Industries
169.	36,391.92	NeighborCare Pharmacies
170.	36,213.04	Cloverleaf Standardbred Owners Assn.
171.	36,066.00	Melwood Horticultural Training Center, Inc.
172.	36,047.60	Legend Properties, Inc.
173.	36,000.00	Eli Lilly & Company
174.	35,713.68	Maryland Association of Community Colleges
175.	35,701.29	Mid-Atlantic Petroleum Distributors Association
176.	35,511.36	M & R Strategic Services
177.	35,483.29	Maryland Motor Truck Association
178.	35,000.00	FMC Corporation
179.	35,000.00	Maryland Rental Car Coalition
180.	35,000.00	Aetna US Healthcare, Inc.
181.	35,000.00	US Public Technologies
182.	35,000.00	Owens Corning
183.	34,500.00	Maryland Association of Mutual Insurance Companies

184.	34,259.73	Warner-Lambert Company
185.	34,179.34	Maryland Children's Initiative, Inc.
186.	33,681.43	R. K. Tongue Company
187.	33,330.88	Anderson Consulting LLP
188.	33,000.00	Maryland Credit Union League
189.	32,778.38	Golden Rule Insurance Company
190.	32,717.63	WMDP Service Station & Automotive Repair Assn.
191.	32,423.00	Maryland Aggregates Association, Inc.
192.	32,230.00	MD/DC/DE Soft Drink Association
193.	32,120.57	American Lung Association of Maryland
194.	31,932.47	Southland Corporation
195.	31,500.00	Tudor Farms, Inc.
196.	31,485.96	NationsBank
197.	31,357.76	US English
198.	31,329.55	Maryland Association of Boards of Education
199.	31,237.59	Alliance of American Insurers
200.	30,780.91	Marine Trades Association of Maryland
201.	30,500.00	Anheuser-Busch Companies
202.	30,500.00	MD/DC/DE Press Association
203.	30,464.36	Maryland Works, Inc.
204.	30,374.00	Alcoa Eastalco Works
205.	30,337.35	Anne Arundel County Association of Realtors, Inc.
206.	30,231.10	Chimes, The
207.	30,075.14	Westvaco Corporation
208.	30,020.00	Howard Rural Legacy Coalition
209.	30,020.00	Maryland Association of Tobacco & Candy
210.	30,000.00	Prudential Health Care Plan of the Mid-Atlantic
211.	30,000.00	Smokeless Tobacco Council
212.	30,000.00	Sodexo Marriott Management, Inc.
213.	29,752.00	Cigar Association of America, Inc.
214.	29,626.60	Pharmacia & Upjohn, Inc.
215.	28,831.25	Foster America, Inc.
216.	28,805.13	Johnson & Johnson
217.	28,744.86	American Academy of Pediatrics, Maryland Chapter
218.	28,500.00	MD/DC Vending Association
219.	28,500.00	Maryland Horse Breeders Association
220.	28,218.35	American Heart Association & Smoke Free Maryland Coalition
221.	28,197.13	Maryland Tourism Council



222.	28,077.31	American College of Emergency Physicians
223.	27,744.31	Life Sciences Corporation
224.	27,628.00	Maryland Cab Association
225.	27,450.00	Sprint Communications Company
226.	26,660.78	Maryland Psychological Association
227.	26,582.08.	R. L. Polk & Company
228.	26,390.00	Kennedy Kreiger Institute
229.	26,325.00	Mid-Atlantic Venture Association
230.	26,226.30	Maryland State Association of Life Underwriters
231.	26,210.00	American Physical Therapy Association of Maryland
232.	26,188.76	Maryland Association of Certified Public Accountants
233.	25,550.00	Maryland Dermatological Society
234.	25,285.10	HealthSouth
235.	25,209.92	Coalition for Job Opportunity Tax Credits
236.	25,203.70	Maryland Society American Institute of Architects, Inc.
237.	25,200.00	Mental Health Association of Maryland
238.	25,178.00	Maryland Society of Accountants
239.	25,000.00	Sherwin-Williams Co, Inc.
240.	25,000.00	Mariner Health Group, Inc.
241.	25,000.00	Maryland Securities Industries
242.	25,000.00	NL Industries
243.	25,000.00	Washington Suburban Sanitary Commission



## APPENDIX B

### LOBBYISTS RECEIVING \$50,000 OR MORE IN COMPENSATION ONE OR MORE EMPLOYERS

*November 1, 1997 - October 31, 1998*

1 .	\$1,164,719.64 *	Evans, Gerard E.
2 .	1,001,797.50	Alexander, Gary R.
3 .	801,822.08	Rifkin, Alan M.
4 .	432,749.99	Bereano, Bruce C.
5 .	413,318.22	Schwartz, Joseph A., III
6 .	395,910.85	Doyle, James J., Jr.
7 .	377,314.56 *	Stierhoff, John R.
8 .	364,599.88	McCoy, Dennis C.
9 .	341,746.00	Rasmussen, Dennis
10 .	341,662.16	Enten, D. Robert
11 .	329,891.11	Pitcher, J. William
12 .	300,134.48	Cooke, Ira C.
13 .	293,533.32	Goldstein, Franklin
14 .	265,063.28	Popham, Bryson
15 .	256,598.19	Tiburzi, Paul A.
16 .	234,885.84	Johansen, Michael V.
17 .	212,311.55	Burridge, Carolyn T.
18 .	198,810.76	Shaivitz, Robin F.
19 .	191,905.25 *	Rozner, Joel D.
20 .	181,500.00	Gisriel, Michael
21 .	167,792.50	Levitan, Laurence
22 .	161,340.32	Neil, John B.
23 .	155,500.00	Canning, Michael F.
24 .	147,622.50	Adler, Maxine
25 .	138,000.00	Pica, John A. Jr.
26 .	137,499.96	O'Dell, Wayne
27 .	132,350.00	Kasemeyer, Pamela Metz
28 .	130,214.40	Doherty, Daniel T., Jr.

29 .	123,000.00	Arrington, Michael
30 .	121,112.28	Doolan, Devin John
31 .	115,057.00	Robinson, Zelig
32 .	107,700.00	White, Peter B.
33 .	104,300.00	Neily, Alice J.
34 .	103,850.00	Manis, Nicholas G.
35 .	97,510.41	Winchester, Albert III
36 .	96,186.00	Powell, Michael C.
37 .	95,575.00	Miedusiewski, American Joe
38 .	93,508.55	Brocato, Barbara Marx
39 .	93,250.00	Manis, George N.
40 .	90,000.00	Behney, Elizabeth Buck
41 .	88,769.00	Stebbins, Dana B.
42 .	87,253.50	Davey, John P.
43 .	86,853.50	McDonough, John P.
44 .	83,700.00	Lanier, Ivan
45 .	80,674.25	Harting, Marta D.
46 .	80,000.00	Lattanzi, E. Thomas
47 .	79,000.00	Goeden, James P.
48 .	76,520.00	Bell, Kevin
49 .	75,345.00	Sheehan, Lorraine M.
50 .	72,138.65	Collins, Carville B.
51 .	69,645.00	Roach, Martha C.
52 .	67,500.00	Carter, W. Minor
53 .	65,000.00	Baker, Ross L.
54 .	63,999.84	Gruber, Victoria
55 .	61,295.49	Bowers, John B., Jr.
56 .	59,220.55	Lighthizer, O James
57 .	57,600.00	Costello, Christopher B.
58 .	57,520.84	Hoover, Lesa N.
59 .	55,825.00	Shaw, Carolyn R.
60 .	53,733.30	Saquella, Thomas S.
61 .	53,000.00	Gunther, Robert
62 .	52,800.00	Sammis, Elizabeth
63 .	52,175.00	Goeller, Katharine

64 .	51,900.00	Doherty, Frances
65 .	50,696.65	Hawkins, Ronald E.
66 .	50,361.00	Kronk, Annie K.
67 .	50,000.00	Resh, Ronald E.

\*There is currently unresolved duplicate reporting of client fees involving four clients represented by Mr. Evans, Mr. Stierhoff and Mr. Rozner. The compensation figures listed include the redundant reporting. The total fees paid by four of the clients are stated to be \$53,500. The total reported was \$32,250 for Mr. Evans, \$6,000 for Mr. Stierhoff and \$40,500 for Mr. Rozner.



# APPENDIX C

## EXPENDITURES ON SPECIAL EVENTS November 1, 1997 - October 31, 1998

<u>Group Invited</u>	<u>Number of Times Invited</u>	<u>Total</u>
All General Assembly	55	\$428,483.39
Senate only	0	0
House only	0	0
Anne Arundel County Delegation	1	584.86
Baltimore City Delegation	4	1,797.56
Baltimore County Delegation	4	1,420.76
Harford County Delegation	2	1,109.58
Montgomery County Delegation	6	9,240.66
Prince George's County Delegation	5	2,749.88
Western Maryland Delegation	1	250.00

### HOUSE

Appropriations	4	2,201.80
Commerce & Governmental Matters	4	1,494.94
Economic Matters	13	13,695.32
Environmental Matters	14	8,546.22
Judiciary	4	3,357.00
Ways and Means	5	5,922.17

### SENATE

Budget and Taxation	8	7,094.38
Economic & Environmental Affairs	11	3,481.69
Finance	17	8,748.21
Judicial Proceedings	9	4,640.33

**TOTAL: \$504,818.75**

(NOTE: Where more than one committee was invited to the same event for the purposes of this report, there may be a proportionate allocation.)

## APPENDIX D

### STATE ETHICS COMMISSION MEMBERS - 1979 TO PRESENT

* Herbert J. Belgrad	1979 to 1986
William B. Calvert	1979 to 1980
Jervis S. Finney	1979 to 1983
Reverend John Wesley Holland	1979 to 1987
* Barbara M. Steckel	1979 to 1990
Betty B. Nelson	1981 to 1988
* Thomas D. Washburne	1984 to 1986
* M. Peter Moser	1987 to 1989
* William J. Evans	1987 to 1993
Reverend C. Anthony Muse	1988 to 1990
Robert C. Rice, PhD	1989 to 1993
* Mark C. Medairy, Jr.	1990 to Present
Mary M. Thompson	1990 to 1994
Shirley P. Hill	1992 to 1994
* Michael L. May	1993 to Present
Robert J. Romadka	1994 to 1997
April E. Sepulveda	1994 to Present
* Charles O. Monk, II	1995 to Present
Dorothy R. Fait	1999 to Present - (did not serve during 1998)

*\*Person served as Chairman during some part  
of their term on the Commission.*

### STATE ETHICS COMMISSION STATUTORY STAFF - 1979 TO PRESENT

John E. O'Donnell, Executive Director	1979 to Present
Nancy L. Speck, General Counsel	1979 to Present
Robert A. Hahn, Staff Counsel	1982 to Present
Frederic M. Brandes, Staff Counsel	1979 to 1982





